



United States
Environmental Protection Agency
 Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

| | |
|---|--|
| Applicant's Name and Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | EPA File Symbol/Registration Number 70506-xxx |
| | Product Name Bifenthrin 180 FS |
| | Date of Confidential Statement of Formula (EPA Form 8570-4) 01/31/2019 |

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Bifenthrin

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

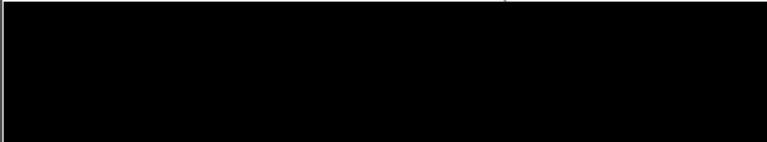

(A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement.

That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

✓ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

| Source | | |
|--|--|---------------------|
| Active Ingredient | Product Name | Registration Number |
| Bifenthrin |  | |
| | | |
| Signature  | Name and Title Crystal Layton, Regulatory Manager | Date 01/31/2020 |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

| | | |
|---|--|----------------------------|
| Date August 30, 2017 | EPA Reg. No./File Symbol 70506-18 | Page 1 of 10 |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | Product Bifenthrin Technical Insecticide/Miticide | |

Ingredient **Bifenthrin (CAS No. 82657-04-3)**

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|--|------------------------------------|-------------------------|--------|---------------------------|
| 830.1550 | Product Identity and Composition | 45654401, 50363501 | United Phosphorus, Inc. | OWN | |
| 830.1600 | Description of Materials Used to Produce the Product | 45654401, 50363501 | United Phosphorus, Inc. | OWN | |
| 830.1620 | Description of Production Process | 45654401, 50363501 | United Phosphorus, Inc. | | |
| 830.1650 | Description of Formulation Process | | | | Not Required ¹ |
| 830.1670 | Discussion of Formation of Impurities | 45654401, 50363501 | United Phosphorus, Inc. | OWN | |
| 830.1700 | Preliminary Analysis | 45654401, 50363501, 50363502 | United Phosphorus, Inc. | OWN | |
| 830.1750 | Certified Limits | 45654401, 50363501 | United Phosphorus, Inc. | OWN | |
| 830.1800 | Enforcement Analytical Method | 45654401, 50363501, 50363502 | United Phosphorus, Inc. | OWN | |
| 830.6302 | Color | 45654402 | United Phosphorus, Inc. | OWN | |

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|--|---|-------------------------|
| Signature  | Name and Title P. Leanne Pruett, Regulatory Consultant | Date August 30, 2017 |
|--|---|-------------------------|

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| Date August 30, 2017 | EPA Reg. No./File Symbol 70506-18 | Page 2 of 10 |
| Applicant's / Registrant's Name & Address <p align="center">United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406</p> | Product Bifenthrin Technical Insecticide/Miticide | |

Ingredient **Bifenthrin (CAS No. 82657-04-3)**

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|---|--------------------|-------------------------|--------|---|
| 830.6303 | Physical State | 45654402 | United Phosphorus, Inc. | OWN | |
| 830.6304 | Odor | 45654402 | United Phosphorus, Inc. | OWN | |
| 830.6313 | Stability to Normal and Elevated Temperatures, Metals, and Metal Ions | 45654403 | United Phosphorus, Inc. | OWN | |
| 830.6314 | Oxidation/Reduction: Chemical Incompatibility | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.6315 | Flammability | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.6316 | Explosibility | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.6317 | Storage Stability | 45654403, 46414201 | United Phosphorus, Inc. | OWN | |
| 830.6319 | Miscibility | | | | Not Required ² |
| 830.6320 | Corrosion Characteristics | 46414201 | United Phosphorus, Inc. | OWN | |
| 830.6321 | Dielectric Breakdown Voltage | | | | Not Required ² |
| 830.7000 | pH | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.7050 | UV/Visible Absorption | CITE ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |

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|--|--|--------------------------------|
| Signature  | Name and Title P. Leanne Pruett, Regulatory Consultant | Date August 30, 2017 |
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| Applicant's / Registrant's Name & Address <p align="center">United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406</p> | | Product Bifenthrin Technical Insecticide/Miticide |

Ingredient **Bifenthrin (CAS No. 82657-04-3)**

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|--|------------------------------------|--------------------------|--------|---|
| 830.7100 | Viscosity | | | | Not Required ² |
| 830.7200 | Melting Point/Melting Range | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.7220 | Boiling Point/Boiling Range | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.7300 | Density/Relative Density/Bulk Density | 45838001, 46008501, 46008502 | United Phosphorus, Inc. | OWN | |
| 830.7370 | Dissociation Constants in Water | 45838001 | United Phosphorus, Inc., | OWN | |
| 830.7520 | Particle size, fiber length, diameter distribution | | | | Not Required ² |
| 830.7550 | Partition Coefficient (n-octanol/water), Shake Flask Method | CITE-ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| 830.7560 | Partition Coefficient (n-octanol/water), Generator Column Method | | | | See 830.7550 |
| 830.7570 | Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography | | | | See 830.7550 |
| 830.7840 | Water Solubility: Column Elution Method; Shake Flask Method | CITE-ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |

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|--|--|--------------------------------|
| Signature  | Name and Title P. Leanne Pruett, Regulatory Consultant | Date August 30, 2017 |
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| Date August 30, 2017 | | | EPA Reg. No./File Symbol 70506-18 | Page 4 of 10 | |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | | Product Bifenthrin Technical Insecticide/Miticide | | |
| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 830.7860 | Water Solubility, Generator Column Method | | | | See 830.7840 |
| 830.7950 | Vapor Pressure | CITE-ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| | | | | | |
| 870.1100 (81-1) | Acute Oral Toxicity: Rat | 45654404 | United Phosphorus, Inc. | OWN | |
| 870.1200 (81-2) | Acute Dermal Toxicity: Rat | 45654405 | United Phosphorus, Inc. | OWN | |
| 870.1300 (81-3) | Acute Inhalation Toxicity: Rat | 00155286 | FMC Corporation | OLD | |
| 870.2400 (81-4) | Primary Eye Irritation: Rabbit | 00132522 | FMC Corporation | OLD | |
| 870.2500 (81-5) | Primary Dermal Irritation | 00132521 | FMC Corporation | OLD | |
| 870.2600 (81-6) | Dermal Sensitization | 00132523 | FMC Corporation | OLD | |
| | | | | | |

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|--|---|-------------------------|
| Signature  | Name and Title P. Leanne Pruett, Regulatory Consultant | Date August 30, 2017 |
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| Date August 30, 2017 | EPA Reg. No./File Symbol 70506-18 | Page 5 of 10 |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | Product Bifenthrin Technical Insecticide/Miticide | |

Ingredient **Bifenthrin (CAS No. 82657-04-3)**

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|--|----------------------|-------------|--|--------|------|
| Product Specific and Generic Data Requirements | | | | | |
| United Phosphorus, Inc. (UPI) is using the cite-all option to satisfy generic data requirements for bifenthrin (128825). UPI will make offers-to-pay to the following companies on the July 5, 2017 Data Submitters List for bifenthrin. | | | | | |
| | | Cite-All | Syngenta Crop Protctn, Greensboro NC | PAY | |
| | | Cite-All | Nufarm Americas, Inc., Morrisville, NC | PAY | |
| | | Cite-All | The Scotts Co. dba Ortho, Marysville, OH | PAY | |
| | | Cite-All | Bayer Cropscience LP; RTP, NC | PAY | |
| | | Cite-All | FMC Corp.; Philadelphia, PA | PAY | |
| | | Cite-All | Bayer Env. Science; RTP, NC | PAY | |
| | | Cite-All | BASF Corp, RTP, NC | PAY | |
| | | Cite-All | The Scotts Co., Marysville, OH | PAY | |
| | | Cite-All | Lebanon Seaboard Corp., Lebanon, PA | PAY | |
| | | Cite-All | McLaughlin Gormley King Co, dba MGK, Minneapolis, MN | PAY | |
| | | Cite-All | Fuller Systems, Inc., Woburn, MA | PAY | |

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|--|--|--------------------------------|
| Signature  | Name and Title P. Leanne Pruett, Regulatory Consultant | Date August 30, 2017 |
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| Date August 30, 2017 | EPA Reg. No./File Symbol 70506-18 | Page 6 of 10 |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | Product Bifenthrin Technical Insecticide/Miticide | |

Ingredient **Bifenthrin (CAS No. 82657-04-3)**

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|----------------------|-------------|---|--------|------|
| | | Cite-All | Winfield Solutions, LLC, St. Paul, MN | PAY | |
| | | Cite-All | Sergeant's Pet Care Prd's, Omaha, NE | PAY | |
| | | Cite-All | Aceto Ag. Chemicals Corp., Port Washington, NY | PAY | |
| | | Cite-All | S. C. Johnson & Son, Inc., Racine, WI | PAY | |
| | | Cite-All | Amvac Chm Corp., Newport Beach, CA | PAY | |
| | | Cite-All | Helena Chemical Co., Memphis, TN | PAY | |
| | | Cite-All | Southern States Co-op., Inc, Salem, VA | PAY | |
| | | Cite-All | Nippon Soda Co., Ltd., New York, NY | PAY | |
| | | Cite-All | The Andersons, Inc., Maumee, OH | PAY | |
| | | Cite-All | Sunniland Corp., Sanford, FL | PAY | |
| | | Cite-All | Chemsico, St. Louis, MO | PAY | |
| | | Cite-All | Lesco, Inc., Cleveland, OH | PAY | |
| | | Cite-All | ADAMA Makhteshim Ltd, c.o. Makhteshim Agan of NA, Raleigh, NC | PAY | |
| | | Cite-All | Loveland Products, Inc., Greeley, CO | PAY | |

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|--|--|--------------------------------|
| Signature  | Name and Title P. Leanne Pruett, Regulatory Consultant | Date August 30, 2017 |
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| Date August 30, 2017 | EPA Reg. No./File Symbol 70506-18 | Page 7 of 10 |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | Product Bifenthrin Technical Insecticide/Miticide | |

Ingredient **Bifenthrin (CAS No. 82657-04-3)**

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|----------------------|-------------|--|--------|------|
| | | Cite-All | Howard Fertilizer & Chm. Co., Salem, VA | PAY | |
| | | Cite-All | Albaugh, LLC, Valdosta, GA | PAY | |
| | | Cite-All | BASF Sparks, LLC, RTP, NC | PAY | |
| | | Cite-All | Control Solutions, Inc., Pasadena, TX | PAY | |
| | | Cite-All | Arizona Chm Grp, c/o Pyxis Regulatory Consulting, Gig Harbor, WA | PAY | |
| | | Cite-All | Valent USA LLC, Walnut Creek, CA | PAY | |
| | | Cite-All | Pyrethroid Working Grp, c/o Landis, Valdosta, GA | PAY | |
| | | Cite-All | Makhteshim Agan of NA, Raleigh, NC | PAY | |
| | | Cite-All | Arysta Lifescience NA, Cary, NC | PAY | |
| | | Cite-All | Spray Drift TF, Washington, DC | OWN | |
| | | Cite-All | Bengal Products, Inc., Baton Rouge, LA | PAY | |
| | | Cite-All | Outdoor Res Exp TF, Washington DC | OWN | |
| | | Cite-All | Ag Reentry TF, Washington, DC | OWN | |

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|--|--|--------------------------------|
| Signature  | Name and Title P. Leanne Pruett, Regulatory Consultant | Date August 30, 2017 |
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| Date August 30, 2017 | EPA Reg. No./File Symbol 70506-18 | Page 8 of 10 |
| Applicant's / Registrant's Name & Address <p align="center">United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406</p> | Product Bifenthrin Technical Insecticide/Miticide | |

Ingredient **Bifenthrin (CAS No. 82657-04-3)**

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|----------------------|-------------|---|--------|------|
| | | Cite-All | Sapstain Industry Group, Titusville, NJ | PAY | |
| | | Cite-All | Non-Dietary Exp TF, Washington, DC | PAY | |
| | | Cite-All | Nisso LLC, New York, NY | PAY | |
| | | Cite-All | Univar Env. Sciences, Brookfield, CT | PAY | |
| | | Cite-All | FIFRA Engangered Species TF, Lakewood, WA | PAY | |
| | | Cite-All | Residential Exposure JV, Washington, DC | PAY | |
| | | Cite-All | Atex, Inc. c/o Landis, Valdosta, GA | PAY | |
| | | Cite-All | Ag Handler Exposure TF, Macon, MO | PAY | |
| | | Cite-All | Osmose Utilities Svcs, Inc, P'tree City GA | PAY | |
| | | Cite-All | Ensystex II, c/o Pyxis, Gig Harbor, WA | PAY | |
| | | Cite-All | Sharda Cropchem Ltd., c/o Wagner, Hockessin, DE | PAY | |
| | | Cite-All | Winfield Solutions, LLC, St. Paul, MN | PAY | |
| | | Cite-All | Tacoma Ag.,c/o Pyxis, Gig Harbor, WA | PAY | |

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|--|--|--------------------------------|
| Signature  | Name and Title P. Leanne Pruett, Regulatory Consultant | Date August 30, 2017 |
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Ingredient **Bifenthrin (CAS No. 82657-04-3)**

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|----------------------|-------------|---|--------|------|
| | | Cite-All | Sharda USA LLC, c/o Wagner, Hockessin, DE | PAY | |
| | | Cite-All | Ensystex IV, c/o Pyxis, Gig Harbor, WA | PAY | |
| | | Cite-All | Wet & Forget USA Ltd, c/o Lewis & Harrison, Washington, DC | PAY | |
| | | Cite-All | Generic Endangered Species TF, c/o Pyxis, Gig Harbor, WA | OWN | |
| | | Cite-All | Kaizen Technologies, Johnston, CO | PAY | |
| | | Cite-All | Bifenthrin TF, c/o CSPA, Washington, DC | OWN | |
| | | Cite-All | Vive Crop Prot. Inc., c/o OMC AG Consulting, East Lansing, MI | PAY | |
| | | Cite-All | Liberty Crop Protection, Loveland, CO | PAY | |
| | | Cite-All | Prime Source c/o Wagner, Hockessin, DE | PAY | |
| | | Cite-All | Genmerica NA, c/o GHB, LeMars, IA | PAY | |
| | | Cite-All | Tevra Brands, LLC, Omaha, NE | PAY | |

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|--|--|--------------------------------|
| Signature  | Name and Title P. Leanne Pruett, Regulatory Consultant | Date August 30, 2017 |
|--|--|--------------------------------|

Endnotes for Data Matrix for Bifenthrin Technical Insecticide/Miticide

August 30, 2017

¹ 830.1650 – per OSCPP 830.1000 guidelines, these data are not required for the registration of a technical grade active ingredient. See 830.1620 for production process information.

² 830.6319, 830.6321, 830.7100, 830.7520 - Per OSCPP 830.1000 guidelines, these data are not required for the registration of a technical grade active ingredient. Additionally, this product is not a liquid, is not a fibrous material, and is not used around electrical equipment



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

| | | |
|--|--|---|
| 1. Company/Product Number | 2. EPA Product Manager | 3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) | PM# | |
| 5. Name and Address of Applicant (Include ZIP Code) <input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ | |

Section - II

| | |
|--|--|
| <input type="checkbox"/> Amendment - Explain below. | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application. |
| <input type="checkbox"/> Notification - Explain below. | <input type="checkbox"/> Other - Explain below. |

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

| | | | | | |
|---|---|--|-------------------|--|-------------------|
| 1. Material This Product Will Be Packaged In: | | | | 2. Type of Container | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | | <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____ | |
| * Certification must be submitted | | If "Yes" Unit Packaging wgt. | No. per container | If "Yes" Package wgt | No. per container |
| 3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container | | 5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product | |
| 6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | | <input type="checkbox"/> Other _____ | | | |

Section - IV

| | | | | | |
|--|--|-------------------|--|---|---|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | | | | |
| Name P. Leanne Pruett | | Title Agent | | Telephone No. (Include Area Code) 253-853-7369 | |
| Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | | | | 6. Date Application Received (Stamped) |
| 2. Signature | | 3. Title Agent | | | |
| 4. Typed Name P. Leanne Pruett | | 5. Date | | | |



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WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

| | |
|--|-------------------------------------|
| Applicant's/Registrant's Name, Address, and Telephone Number | EPA Registration Number/File Symbol |
| Active Ingredient(s) and/or representative test compound(s) | Date |
| General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) | Product Name |

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☐ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

P. Leanne Pruett

Date

Typed or Printed Name and Title

P. Leanne Pruett, Agent

| | | |
|---|---|-----------------------|
|  <div style="text-align: center;"> Environmental Protection Agency United States Washington, DC 20460 </div> | <input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other | OPP Identifier Number |
|---|---|-----------------------|

Application for Pesticide – Section I

| | | |
|--|---|--|
| 1. Company/Product Number United Phosphorus, Inc. / 70506-18 | 2. EPA Product Manager K. Davis | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) United Phosphorus, Inc. / Bifenthrin Technical Insecticide/Miticide | PM# 3 | |
| 5. Name and Address of Applicant (include ZIP Code) United Phosphorus, Inc. c/o Pyxis Regulatory Consulting Inc. 4110 136 th St. Ct. NW Gig Harbor, WA 98332 | | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ |

Section - II

| | |
|---|--|
| <input checked="" type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification – Explain below. | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> “Me Too” Application. <input type="checkbox"/> Other – Explain below. |
|---|--|

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

This action falls under PRIA Category R351 (57: amendment adding a new unregistered source of active ingredient). The PRIA fee of \$13,226 has been paid. Please feel free to contact me (T) 253-853-7369 or (E) Nicole@PyxisRC.com if you have any questions or need any additional information.

Section - III**1. Material This Product Will Be Packaged In:**

| | | | | | | | |
|--|--|---|--|--------------------------------|------------------------------------|--------------------------------|--|
| Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | 2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____ | | | | |
| * Certification must be submitted | | <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">If “Yes” Unit Packaging wgt. _____</td> <td style="width:50%;">No. per container _____</td> </tr> <tr> <td style="width:50%;">If “Yes” Package wgt. _____</td> <td style="width:50%;">No. per container _____</td> </tr> </table> | If “Yes” Unit Packaging wgt. _____ | No. per container _____ | If “Yes” Package wgt. _____ | No. per container _____ | |
| If “Yes” Unit Packaging wgt. _____ | No. per container _____ | | | | | | |
| If “Yes” Package wgt. _____ | No. per container _____ | | | | | | |
| 3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container _____ | 5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product | | | | |
| 6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | | | | | | | |

Section - IV**1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)**

| | | |
|--|--|--|
| Name Nicole O'Loughlin | Title Regulatory Consultant | Telephone No. (Include Area Code) (253) 853-7369 |
| <div style="text-align: center;">Certification</div> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | 6. Date Application Received <div style="text-align: center; font-weight: bold;">(Stamped)</div> |
| 2. Signature  | 3. Title Regulatory Consultant | |
| 4. Typed Name Nicole O'Loughlin | 5. Date Mar. 30, 2018 | |



United Phosphorus, Inc.

David L. Olson
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406
(610) 491-2814
dave.olson@uniphos.com

April 2, 2010

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as an agent for United Phosphorus, Inc. (EPA Company Number 70506), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

David L. Olson
Director, Regulatory Affairs

cc: Pyxis Regulatory Consulting, Inc.



United Phosphorus, Inc.

David L. Olson
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406
(610) 491-2814
dave.olson@uniphos.com

January 6, 2017

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as Consultant for United Phosphorus, Inc. (UPI), EPA Company Number 70506, before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), 7 U.S.C. § 136 et seq. and state law. This is a change from their previous status as Agent.

If you have any questions, please do not hesitate to contact me.

Sincerely,

David L. Olson

Cc: Pyxis Regulatory Consulting

Commercial/financial information may be entitled to confidential treatment



Receipt

Your payment is submitted

Pay.gov Tracking ID: 264EN6U5
Agency Tracking ID: 75311871148
Form Name: Pesticide Registration Improvement Act - Prepayment
Application Name: PRIA Service Fees

Payment Information

Payment Type: Bank account (ACH)
Payment Amount: \$13,226.00
Transaction Date: 08/25/2017 08:51:25 AM EDT
Payment Date: 08/28/2017
Registration Number: 70506-18
Company Name: United Phosphorus, Inc.
Company Number: 70506
Action Code: R351

Account Information

Account Holder Name: United Phosphorus, Inc.

Account Number: *****2762

Email Confirmation Receipt

Confirmation Receipts have been emailed to:
sherry.hutcheson@uniphos.com
wes.daughtry@uniphos.com



4110 136TH ST CT NW
GIG HARBOR, WA 98332
T: (253) 853-7369
F: (253) 853-5516
LEANNE@PYXISRC.COM

August 31, 2017

via ELECTRONIC DELIVERY

Elizabeth Fertich (PM 3)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

**Transmittal MRID
503635-00**

RE: United Phosphorus, Inc. – Bifenthrin Technical Insecticide/Miticide (EPA Reg. No. 70506-18)
Amendment to Add Alternate Source
PRIA Category R351

Dear Ms. Fertich,

On behalf of United Phosphorus, Inc., we are submitting an application to amend the registration of Bifenthrin Technical Insecticide/Miticide to add an unregistered source of active ingredient. In support of this application, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. Confidential Statement of Formula (EPA Form 8570-4) for Alternate Formulation #1
3. Certification with Respect to Citation of Data (EPA Form 8570-34)
4. Data Matrix (EPA Form 8570-35) – Agency Internal Use and Public File Copies
5. Copy of the PRIA payment
6. Letter of Authorization
7. Product Specific Data:

| MRID | Guideline | Study Title |
|----------|--|---|
| 50363501 | 830.1550, 830.1600, 830.1620, 830.1670, 830.1750, 830.1800 | Pruett, P. L. (2017). Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for Bifenthrin Technical Insecticide/Miticide. |
| 50363502 | 830.1700, 830.1800 | Amruskar, A. (2017). Preliminary Analyses of Five Representative Production Batches of Bifenthrin Technical Grade Active Ingredient (TGA) to Determine % Bifenthrin and to Quantify its Associated Impurities. |

United Phosphorus, Inc. certifies that this new source qualifies as an alternate to their existing manufacturing document on file with the Agency for this registration. This action falls under Category R351 (57: Amendment adding a new unregistered source of active ingredient). The fee due which has been paid is \$13,226.

We trust you will find this application complete. However, please contact me by email (Leanne@PyxisRC.com) or phone at (253) 853-7369 if you have questions or need additional information

Best Regards,

P. Leanne Pruett

Enclosures
cc: United Phosphorus, Inc.

Commercial/financial information may be entitled to confidential treatment



Receipt

Your payment is submitted

Pay.gov Tracking ID: 267V6275
Agency Tracking ID: 75429527133
Form Name: Pesticide Registration Improvement Act - Prepayment
Application Name: PRIA Service Fees

Payment Information

Payment Type: Bank account (ACH)
Payment Amount: \$13,226.00
Transaction Date: 02/22/2018 01:27:49 PM EST
Payment Date: 02/23/2018
Registration Number: 70506-18
Company Name: UNITED PHOSPHORUS INC
Company Number: 70506
Action Code: R351

Account Information

Account Holder Name: United Phosphorus, Inc.

Account Number: *****2762

Email Confirmation Receipt

Confirmation Receipts have been emailed to:
sherry.hutcheson@uniphos.com
wes.daughtry@uniphos.com



4110 136TH ST CT NW
GIG HARBOR, WA 98332
T: (253) 853-7369
F: (253) 853-5516
NICOLE@PYXISRC.COM

MRID 505500-00

March 30, 2018

ELECTRONIC SUBMISSION

Kable (Bo) Davis (PM 33)
Document Processing Desk (**REGFEE**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: United Phosphorus, Inc. – Bifenthrin Technical Insecticide/Miticide (EPA Reg. No. 70506-18)
Application to Amend Pesticide Registration
PRIA Category R351

Dear Mr. Davis,

On behalf of United Phosphorus, Inc., please find the enclosed application to amend the registration of Bifenthrin Technical Insecticide/Miticide (EPA Reg. No. 70506-18) to add an unregistered source of active ingredient.

In support of this application, the following documents are enclosed:

1. Application for Amended Pesticide Registration (EPA Form 8570-1)
2. Receipt of PRIA pre-payment from pay.gov
3. Confidential Statement of Formula (EPA Form 8570-4) (Alternate Formulation #2 dated 3/20/2018)
4. Certification with Respect to Citation of Data (EPA Form 8570-34)
5. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
6. Public File Copy of the Data Matrix (EPA Form 8570-35)
7. Letter of Authorization from United Phosphorus, Inc.
8. Product Specific Data:

| MRID No. | Guideline | Report Title |
|----------|--|---|
| 50550001 | 830.1550, 830.1600, 830.1620, 830.1670, 830.1750, 830.1800 | O'Loughlin, N.A. Product Identity and Composition, Description of Starting Materials and Formulation Process, Discussion of the Formation of Impurities, and Certified Limits for Bifenthrin Technical Insecticide/Miticide. [Contains confidential attachment] |
| 50550002 | 830.1700, 830.1800 | Tomaz, L. Qualitative and Quantitative Profile of the test substance Bifenthrin Technical (Five Batch Analysis). [Contains confidential attachment] |

United Phosphorus, Inc. certifies that this new source qualifies as an alternate to their existing manufacturing document on file with the Agency for this registration. This action falls under PRIA category R351 (57: Amendment adding a new unregistered source of active ingredient). The fee for this action is \$13,226 and has been paid.

We trust you will find this application complete and in compliance with the requirements for registration under FIFRA. Please feel free to contact me (T) 253-853-7369 or (E) Nicole@PyxisRC.com if you have any questions or need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicole O'Loughlin". The signature is fluid and cursive, with the first name "Nicole" and last name "O'Loughlin" clearly distinguishable.

Nicole O'Loughlin

Enclosures

cc: S. Hutcheson; United Phosphorus, Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

| | |
|---|---|
| Applicant's/Registrant's Name, Address, and Telephone Number United Phosphorus, Inc.; c/o Pyxis Regulatory Consulting, Inc.; 4110 136 th St. Ct. NW, Gig Harbor, WA 98332; (253) 853-7369 | EPA Registration Number/File Symbol 70506-18 |
| Active Ingredient(s) and/or representative test compound(s) Bifenthrin | Date Mar. 30, 2018 |
| General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) TGA1 | Product Name Bifenthrin Technical Insecticide/Miticide |

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statements (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offer of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

| | |
|--|---|
| <input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose). | <input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used). |
|--|---|

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (II) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

| | | |
|---------------|-----------------------|--|
| Signature | Date Mar. 30, 2018 | Typed or Printed Name and Title Nicole O'Loughlin Regulatory Consultant |
|---------------|-----------------------|--|

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

| Date Mar. 30, 2018 | | | EPA Reg. No./File Symbol 70506-18 | Page 1 of 11 | |
|---|--|---|---|--------------|---------------------------|
| Applicant's / Registrant's Name & Address <p align="center">United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406</p> | | | Product Bifenthrin Technical Insecticide/Miticide | | |
| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 830.1550 | Product Identity and Composition | 45654401, 50363501, 50550001 | United Phosphorus, Inc. | OWN | |
| 830.1600 | Description of Materials Used to Produce the Product | 45654401, 50363501, 50550001 | United Phosphorus, Inc. | OWN | |
| 830.1620 | Description of Production Process | 45654401, 50363501, 50550001 | United Phosphorus, Inc. | | |
| 830.1650 | Description of Formulation Process | | | | Not Required ¹ |
| 830.1670 | Discussion of Formation of Impurities | 45654401, 50363501, 50550001 | United Phosphorus, Inc. | OWN | |
| 830.1700 | Preliminary Analysis | 45654401, 50363501, 50363502, 50550002 | United Phosphorus, Inc. | OWN | |

| | | |
|--|---|------------------------------|
| Signature  | Name and Title Nicole O'Loughlin, Regulatory Consultant | Date Mar. 30, 2018 |
|--|---|------------------------------|

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

| | | |
|---|--|---|
| Date Mar. 30, 2018 | EPA Reg. No./File Symbol 70506-18 | Page 2 of 11 |
| Applicant's / Registrant's Name & Address <p align="center">United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406</p> | | Product Bifenthrin Technical Insecticide/Miticide |

Ingredient **Bifenthrin (CAS No. 82657-04-3)**

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|---|---|-------------------------|--------|------|
| 830.1750 | Certified Limits | 45654401, 50363501, 50550001 | United Phosphorus, Inc. | OWN | |
| 830.1800 | Enforcement Analytical Method | 45654401, 50363501, 50363502, 50550002 | United Phosphorus, Inc. | OWN | |
| 830.6302 | Color | 45654402 | United Phosphorus, Inc. | OWN | |
| 830.6303 | Physical State | 45654402 | United Phosphorus, Inc. | OWN | |
| 830.6304 | Odor | 45654402 | United Phosphorus, Inc. | OWN | |
| 830.6313 | Stability to Normal and Elevated Temperatures, Metals, and Metal Ions | 45654403 | United Phosphorus, Inc. | OWN | |
| 830.6314 | Oxidation/Reduction: Chemical Incompatibility | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.6315 | Flammability | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.6316 | Explosibility | 45838001 | United Phosphorus, Inc. | OWN | |

| | | |
|--|---|------------------------------|
| Signature  | Name and Title Nicole O'Loughlin, Regulatory Consultant | Date Mar. 30, 2018 |
|--|---|------------------------------|

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

| | | |
|---|--|---|
| Date Mar. 30, 2018 | EPA Reg. No./File Symbol 70506-18 | Page 3 of 11 |
| Applicant's / Registrant's Name & Address <p align="center">United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406</p> | | Product Bifenthrin Technical Insecticide/Miticide |

Ingredient **Bifenthrin (CAS No. 82657-04-3)**

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|---------------------------------------|------------------------------------|--------------------------|--------|---|
| 830.6317 | Storage Stability | 45654403, 46414201 | United Phosphorus, Inc. | OWN | |
| 830.6319 | Miscibility | | | | Not Required ² |
| 830.6320 | Corrosion Characteristics | 46414201 | United Phosphorus, Inc. | OWN | |
| 830.6321 | Dielectric Breakdown Voltage | | | | Not Required ² |
| 830.7000 | pH | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.7050 | UV/Visible Absorption | CITE ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| 830.7100 | Viscosity | | | | Not Required ² |
| 830.7200 | Melting Point/Melting Range | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.7220 | Boiling Point/Boiling Range | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.7300 | Density/Relative Density/Bulk Density | 45838001, 46008501, 46008502 | United Phosphorus, Inc. | OWN | |
| 830.7370 | Dissociation Constants in Water | 45838001 | United Phosphorus, Inc., | OWN | |

| | | |
|--|---|------------------------------|
| Signature  | Name and Title Nicole O'Loughlin, Regulatory Consultant | Date Mar. 30, 2018 |
|--|---|------------------------------|

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

| | | |
|---|--|---|
| Date Mar. 30, 2018 | EPA Reg. No./File Symbol 70506-18 | Page 4 of 11 |
| Applicant's / Registrant's Name & Address <p align="center">United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406</p> | | Product Bifenthrin Technical Insecticide/Miticide |

Ingredient **Bifenthrin (CAS No. 82657-04-3)**

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|--|-------------|-------------------------|--------|---|
| 830.7520 | Particle size, fiber length, diameter distribution | | | | Not Required ² |
| 830.7550 | Partition Coefficient (n-octanol/water), Shake Flask Method | CITE-ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| 830.7560 | Partition Coefficient (n-octanol/water), Generator Column Method | | | | See 830.7550 |
| 830.7570 | Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography | | | | See 830.7550 |
| 830.7840 | Water Solubility: Column Elution Method; Shake Flask Method | CITE-ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| 830.7860 | Water Solubility, Generator Column Method | | | | See 830.7840 |
| 830.7950 | Vapor Pressure | CITE-ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| | | | | | |
| 870.1100 (81-1) | Acute Oral Toxicity: Rat | 45654404 | United Phosphorus, Inc. | OWN | |

| | | |
|--|---|------------------------------|
| Signature  | Name and Title Nicole O'Loughlin, Regulatory Consultant | Date Mar. 30, 2018 |
|--|---|------------------------------|

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DATA MATRIX

| | | |
|---|--|---|
| Date Mar. 30, 2018 | EPA Reg. No./File Symbol 70506-18 | Page 5 of 11 |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | Product Bifenthrin Technical Insecticide/Miticide |

Ingredient **Bifenthrin (CAS No. 82657-04-3)**

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|---|--------------------------------|-------------|--|--------|------|
| 870.1200 (81-2) | Acute Dermal Toxicity: Rat | 45654405 | United Phosphorus, Inc. | OWN | |
| 870.1300 (81-3) | Acute Inhalation Toxicity: Rat | 00155286 | FMC Corporation | OLD | |
| 870.2400 (81-4) | Primary Eye Irritation: Rabbit | 00132522 | FMC Corporation | OLD | |
| 870.2500 (81-5) | Primary Dermal Irritation | 00132521 | FMC Corporation | OLD | |
| 870.2600 (81-6) | Dermal Sensitization | 00132523 | FMC Corporation | OLD | |
| | | | | | |
| Product Specific and Generic Data Requirements | | | | | |
| United Phosphorus, Inc. (UPI) is using the cite-all option to satisfy generic data requirements for bifenthrin (128825). UPI has made offers-to-pay to the following companies on the Jan. 9, 2018 Data Submitters List for bifenthrin. | | | | | |
| | | Cite-All | Syngenta Crop Protctn, Greensboro NC | PAY | |
| | | Cite-All | Nufarm Americas, Inc., Morrisville, NC | PAY | |
| | | Cite-All | The Scotts Co. dba Ortho, Marysville, OH | PAY | |
| | | Cite-All | Bayer Cropscience LP; RTP, NC | PAY | |
| | | Cite-All | FMC Corp.; Philadelphia, PA | PAY | |

| | | |
|--|---|------------------------------|
| Signature  | Name and Title Nicole O'Loughlin, Regulatory Consultant | Date Mar. 30, 2018 |
|--|---|------------------------------|

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DATA MATRIX

| | | |
|---|---|----------------------------|
| Date Mar. 30, 2018 | EPA Reg. No./File Symbol 70506-18 | Page 6 of 11 |
| Applicant's / Registrant's Name & Address <p align="center">United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406</p> | Product Bifenthrin Technical Insecticide/Miticide | |

Ingredient **Bifenthrin (CAS No. 82657-04-3)**

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|----------------------|-------------|--|--------|------|
| | | Cite-All | Bayer Env. Science; RTP, NC | PAY | |
| | | Cite-All | BASF Corp, RTP, NC | PAY | |
| | | Cite-All | The Scotts Co., Marysville, OH | PAY | |
| | | Cite-All | Lebanon Seaboard Corp., Lebanon, PA | PAY | |
| | | Cite-All | McLaughlin Gormley King Co, dba MGK, Minneapolis, MN | PAY | |
| | | Cite-All | Fuller Systems, Inc., Woburn, MA | PAY | |
| | | Cite-All | Winfield Solutions, LLC, St. Paul, MN | PAY | |
| | | Cite-All | Sergeant's Pet Care Prd's, Omaha, NE | PAY | |
| | | Cite-All | Aceto Ag. Chemicals Corp., Port Washington, NY | PAY | |
| | | Cite-All | S. C. Johnson & Son, Inc., Racine, WI | PAY | |
| | | Cite-All | Amvac Chm Corp., Newport Beach, CA | PAY | |
| | | Cite-All | Helena Chemical Co., Memphis, TN | PAY | |
| | | Cite-All | Southern States Co-op., Inc, Salem, VA | PAY | |
| | | Cite-All | Nippon Soda Co., Ltd., New York, NY | PAY | |

| | | |
|--|---|------------------------------|
| Signature  | Name and Title Nicole O'Loughlin, Regulatory Consultant | Date Mar. 30, 2018 |
|--|---|------------------------------|

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DATA MATRIX

Date Mar. 30, 2018

EPA Reg. No./File Symbol 70506-18

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Applicant's / Registrant's Name & Address

United Phosphorus, Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

Product

Bifenthrin Technical Insecticide/Miticide

Ingredient Bifenthrin (CAS No. 82657-04-3)

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|----------------------|-------------|--|--------|------|
| | | Cite-All | The Andersons, Inc., Maumee, OH | PAY | |
| | | Cite-All | Sunniland Corp., Sanford, FL | PAY | |
| | | Cite-All | Chemsico, St. Louis, MO | PAY | |
| | | Cite-All | Lesco, Inc., Cleveland, OH | PAY | |
| | | Cite-All | ADAMA Makhteshim Ltd, c.o. Makhteshim Agan of NA, Raleigh, NC | PAY | |
| | | Cite-All | Loveland Products, Inc., Greeley, CO | PAY | |
| | | Cite-All | Howard Fertilizer & Chm. Co., Salem, VA | PAY | |
| | | Cite-All | Albaugh, LLC, Valdosta, GA | PAY | |
| | | Cite-All | BASF Sparks, LLC, RTP, NC | PAY | |
| | | Cite-All | Control Solutions, Inc., Pasadena, TX | PAY | |
| | | Cite-All | Arizona Chm Grp, c/o Pyxis Regulatory Consulting, Gig Harbor, WA | PAY | |
| | | Cite-All | Valent USA LLC, Walnut Creek, CA | PAY | |
| | | Cite-All | Pyrethroid Working Grp, c/o Landis, Valdosta, GA | PAY | |

Signature



Name and Title

Nicole O'Loughlin, Regulatory Consultant

Date

Mar. 30, 2018

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DATA MATRIX

| | | |
|---|--|---|
| Date Mar. 30, 2018 | EPA Reg. No./File Symbol 70506-18 | Page 8 of 11 |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | Product Bifenthrin Technical Insecticide/Miticide |

Ingredient **Bifenthrin (CAS No. 82657-04-3)**

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|----------------------|-------------|---|--------|------|
| | | Cite-All | Makhteshim Agan of NA, Raleigh, NC | PAY | |
| | | Cite-All | Arysta Lifescience NA, Cary, NC | PAY | |
| | | Cite-All | Spray Drift TF, Washington, DC | OWN | |
| | | Cite-All | Bengal Products, Inc., Baton Rouge, LA | PAY | |
| | | Cite-All | Outdoor Res Exp TF, Washington DC | OWN | |
| | | Cite-All | Ag Reentry TF, Washington, DC | OWN | |
| | | Cite-All | Sapstain Industry Group, Titusville, NJ | PAY | |
| | | Cite-All | Non-Dietary Exp TF, Washington, DC | PAY | |
| | | Cite-All | Nisso LLC, New York, NY | PAY | |
| | | Cite-All | Univar Env. Sciences, Brookfield, CT | PAY | |
| | | Cite-All | FIFRA Engangered Species TF, Lakewood, WA | PAY | |
| | | Cite-All | Residential Exposure JV, Washington, DC | PAY | |
| | | Cite-All | Atex, Inc. c/o Landis, Valdosta, GA | PAY | |

| | | |
|--|---|------------------------------|
| Signature  | Name and Title Nicole O'Loughlin, Regulatory Consultant | Date Mar. 30, 2018 |
|--|---|------------------------------|

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DATA MATRIX

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|---|---|----------------------------|
| Date Mar. 30, 2018 | EPA Reg. No./File Symbol 70506-18 | Page 9 of 11 |
| Applicant's / Registrant's Name & Address <p align="center">United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406</p> | Product Bifenthrin Technical Insecticide/Miticide | |

Ingredient **Bifenthrin (CAS No. 82657-04-3)**

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|----------------------|-------------|--|--------|------|
| | | Cite-All | Ag Handler Exposure TF, Macon, MO | OWN | |
| | | Cite-All | Osmose Utilities Svcs, Inc, P'tree City GA | PAY | |
| | | Cite-All | Ensystex II, c/o Pyxis, Gig Harbor, WA | PAY | |
| | | Cite-All | Sharda Cropchem Ltd., c/o Wagner, Hockessin, DE | PAY | |
| | | Cite-All | Winfield Solutions, LLC, St. Paul, MN | PAY | |
| | | Cite-All | Tacoma Ag., c/o Pyxis, Gig Harbor, WA | PAY | |
| | | Cite-All | Sharda USA LLC, c/o Wagner, Hockessin, DE | PAY | |
| | | Cite-All | Ensystex IV, c/o Pyxis, Gig Harbor, WA | PAY | |
| | | Cite-All | Ragan and Massey, Inc, c/o Pyxis, Gig Harbor, WA | PAY | |
| | | Cite-All | Wet & Forget USA Ltd, c/o Lewis & Harrison, Washington, DC | PAY | |
| | | Cite-All | Generic Endangered Species TF, c/o Pyxis, Gig Harbor, WA | OWN | |
| | | Cite-All | Kaizen Technologies, Johnston, CO | PAY | |

| | | |
|--|---|------------------------------|
| Signature  | Name and Title Nicole O'Loughlin, Regulatory Consultant | Date Mar. 30, 2018 |
|--|---|------------------------------|

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DATA MATRIX

| | | | | | |
|---|----------------------|---|---|-----------------------------|------|
| Date Mar. 30, 2018 | | EPA Reg. No./File Symbol 70506-18 | | Page 10 of 11 | |
| Applicant's / Registrant's Name & Address <p align="center">United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406</p> | | Product Bifenthrin Technical Insecticide/Miticide | | | |
| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | Cite-All | Bifenthrin TF, c/o CSPA, Washington, DC | OWN | |
| | | Cite-All | Solutions Pest & Lawn, c/o Biologic Brookfield, CT | PAY | |
| | | Cite-All | Vive Crop Prot. Inc., c/o OMC AG Consulting, East Lansing, MI | PAY | |
| | | Cite-All | Liberty Crop Protection, Loveland, CO | PAY | |
| | | Cite-All | Prime Source c/o Wagner, Hockessin, DE | PAY | |
| | | Cite-All | Genmerica NA, c/o GHB, LeMars, IA | PAY | |
| | | Cite-All | Tevra Brands, LLC, Omaha, NE | PAY | |

| | | |
|--|---|------------------------------|
| Signature  | Name and Title Nicole O'Loughlin, Regulatory Consultant | Date Mar. 30, 2018 |
|--|---|------------------------------|

Endnotes for Data Matrix for Bifenthrin Technical Insecticide/Miticide

Mar. 30, 2018

¹ 830.1650 – per OSCPP 830.1000 guidelines, these data are not required for the registration of a technical grade active ingredient. See 830.1620 for production process information.

² 830.6319, 830.6321, 830.7100, 830.7520 - Per OSCPP 830.1000 guidelines, these data are not required for the registration of a technical grade active ingredient. Additionally, this product is not a liquid, is not a fibrous material, and is not used around electrical equipment

**EPA**

United States
Environmental Protection Agency
 Washington, DC 20460

☐ **Registration**
☒ **Amendment**
☐ **Other:**

OPP Identifier Number

Application for Pesticide - Section I

| | | |
|---|--|---|
| 1. Company/Product Number United Phosphorous, Inc./70506-18 | 2. EPA Product Manager Mindy Ondish | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) BIFENTHRIN TECHNICAL INSECTICIDE/MITICIDE | PM# 3 | |
| 5. Name and Address of Applicant (Include ZIP Code) United Phosphorus, Inc. 630 Freedom Business Center, Ste. 402 King of Prussia, PA 19406 | | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ |
| <input type="checkbox"/> Check if this is a new address | | |

Section - II

| | |
|--|--|
| <input checked="" type="checkbox"/> Amendment – Explain below. | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application |
| <input type="checkbox"/> Notification - Explain below. | <input type="checkbox"/> Other - Explain below |

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

This submission is being made to amend the label for BIFENTHRIN TECHNICAL INSECTICIDE/MITICIDE (EPA Reg. No. 70506-18) to expand the for formulation into directions for use, Spanish signal word, and add container handling instructions for fiber drum container. Please see the cover letter for additional details.

Section - III

| | | | |
|--|---|--|--|
| 1. Material This Product Will Be Packaged In: | | | |
| Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | 2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) |
| * Certification must be submitted | | If "Yes" Unit Packaging wgt. No. per container | If "Yes" Package wgt. No. per container |
| 3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container | |
| | | 5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product | |
| 6. Manner in Which Label is Affixed to Product | | <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | |

Section - IV

| | | |
|--|--------------------------------|--|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application) | | |
| Name Crystal Layton | Title Regulatory Manager | Telephone No. (Include Area Code) 229-583-3006 |
| Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | 6. Date Application Received (Stamped) |
| 2. Signature | 3. Title Regulatory Manager | |
| 4. Typed Name Crystal Layton | 5. Date 11/28/18 | |



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1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

| | |
|---|---|
| Applicant's/Registrant's Name, Address, and Telephone Number 229-583-3006 United Phosphorus, Inc., 630 Freedom Business Center, Suite 402, King of Prussia, PA 19406 | EPA Registration Number/File Symbol 70506-18 |
| Active Ingredient(s) and/or representative test compound(s) Bifenthrin | Date 11/28/2018 |
| General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) TGAI | Product Name Bifenthrin Technical Insecticide/Miticide |

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).



I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)



I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).



I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]



I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Crystal Layton

Date

11/28/2018

Typed or Printed Name and Title

Crystal Layton, Regulatory Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Form Approved OMB No. 2070-0060


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DATA MATRIX

| | | | | | |
|---|----------------------|--|-----------|--------------|------|
| Date November 28, 2018 | | EPA Reg. No./File Symbol 70506-18 | | Page 1 of 13 | |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | Product Bifenthrin Technical Insecticide/Miticide | | | |
| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |

| Product Chemistry Series A | | | | | |
|----------------------------|--|------------------------------------|-------------------------|-----|---------------------------|
| 830.1550 | Product Identity and Composition | 45654401, 50363501 | United Phosphorus, Inc. | OWN | |
| 830.1600 | Description of Materials Used to Produce the Product | 45654401, 50363501 | United Phosphorus, Inc. | OWN | |
| 830.1620 | Description of Production Process | 45654401, 50363501 | United Phosphorus, Inc. | | |
| 830.1650 | Description of Formulation Process | | | | Not Required ¹ |
| 830.1670 | Discussion of Formation of Impurities | 45654401, 50363501 | United Phosphorus, Inc. | OWN | |
| 830.1700 | Preliminary Analysis | 45654401, 50363501, 50363502 | United Phosphorus, Inc. | OWN | |
| 830.1750 | Certified Limits | 45654401, 50363501 | United Phosphorus, Inc. | OWN | |

| | | |
|--|--|------------------|
| Signature  | Name and Title Crystal Layton, Regulatory Manager | Date 11/28/18 |
|--|--|------------------|

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Form Approved OMB No. 2070-0060


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|--|----------------------|--|-----------|--|------|
| Date November 28, 2018 | | EPA Reg. No./File Symbol 70506-18 | | Page 2 of 13 | |
| Applicant's / Registrant's Name & Address | | United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | Product Bifenthrin Technical Insecticide/Miticide | |
| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |

| | | | | | |
|-----------------------------------|---|------------------------------------|-------------------------|-----|--|
| 830.1800 | Enforcement Analytical Method | 45654401, 50363501, 50363502 | United Phosphorus, Inc. | OWN | |
| Product Chemistry Series B | | | | | |
| 830.6302 | Color | 45654402 | United Phosphorus, Inc. | OWN | |
| 830.6303 | Physical State | 45654402 | United Phosphorus, Inc. | OWN | |
| 830.6304 | Odor | 45654402 | United Phosphorus, Inc. | OWN | |
| 830.6313 | Stability to Normal and Elevated Temperatures, Metals, and Metal Ions | 45654403 | United Phosphorus, Inc. | OWN | |
| 830.6314 | Oxidation/Reduction: Chemical Incompatibility | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.6315 | Flammability | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.6316 | Explosibility | 45838001 | United Phosphorus, Inc. | OWN | |

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| Signature  | Name and Title Crystal Layton, Regulatory Manager | Date 11/28/18 |
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY


Form Approved OMB No. 2070-0060

401 M Street, S.W.
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DATA MATRIX

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|---|------------------------------|--|-------------------------|--------------|---|
| Date November 28, 2018 | | EPA Reg. No./File Symbol 70506-18 | | Page 3 of 13 | |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | Product Bifenthrin Technical Insecticide/Miticide | | | |
| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 830.6317 | Storage Stability | 45654403, 46414201 | United Phosphorus, Inc. | OWN | |
| 830.6319 | Miscibility | | | | Not Required ² |
| 830.6320 | Corrosion Characteristics | 46414201 | United Phosphorus, Inc. | OWN | |
| 830.6321 | Dielectric Breakdown Voltage | | | | Not Required ² |
| 830.7000 | pH | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.7050 | UV/Visible Absorption | CITE ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| 830.7100 | Viscosity | | | | Not Required ² |
| 830.7200 | Melting Point/Melting Range | 45838001 | United Phosphorus, Inc. | OWN | |
| 830.7220 | Boiling Point/Boiling Range | 45838001 | United Phosphorus, Inc. | OWN | |

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|--|--|------------------|
| Signature  | Name and Title Crystal Layton, Regulatory Manager | Date 11/28/18 |
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| Date November 28, 2018 | | | EPA Reg. No./File Symbol 70506-18 | Page 4 of 13 | |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | | Product Bifenthrin Technical Insecticide/Miticide | | |
| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 830.7300 | Density/Relative Density/Bulk Density | 45838001, 46008501, 46008502 | United Phosphorus, Inc. | OWN | |
| 830.7370 | Dissociation Constants in Water | 45838001 | United Phosphorus, Inc., | OWN | |
| 830.7520 | Particle size, fiber length, diameter distribution | | | | Not Required ² |
| 830.7550 | Partition Coefficient (n-octanol/water), Shake Flask Method | CITE-ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| 830.7560 | Partition Coefficient (n-octanol/water), Generator Column Method | | | | See 830.7550 |
| 830.7570 | Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography | | | | See 830.7550 |
| 830.7840 | Water Solubility: Column Elution Method; Shake Flask Method | CITE-ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| 830.7860 | Water Solubility, Generator Column Method | | | | See 830.7840 |

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| Signature  | Name and Title Crystal Layton, Regulatory Manager | Date 11/28/18 |
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| Date November 28, 2018 | | EPA Reg. No./File Symbol 70506-18 | | Page 5 of 13 | |
| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | Product Bifenthrin Technical Insecticide/Miticide | | | |
| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |

| | | | | | |
|-----------------------|--------------------------------|----------|-------------------------|-----|---|
| 830.7950 | Vapor Pressure | CITE-ALL | | PAY | See list of companies in 'Generic Data' section of Matrix |
| Acute Toxicity | | | | | |
| 870.1100 (81-1) | Acute Oral Toxicity: Rat | 45654404 | United Phosphorus, Inc. | OWN | |
| 870.1200 (81-2) | Acute Dermal Toxicity: Rat | 45654405 | United Phosphorus, Inc. | OWN | |
| 870.1300 (81-3) | Acute Inhalation Toxicity: Rat | 00155286 | FMC Corporation | OLD | |
| 870.2400 (81-4) | Primary Eye Irritation: Rabbit | 00132522 | FMC Corporation | OLD | |
| 870.2500 (81-5) | Primary Dermal Irritation | 00132521 | FMC Corporation | OLD | |
| 870.2600 (81-6) | Dermal Sensitization | 00132523 | FMC Corporation | OLD | |

| | | |
|--|--|------------------|
| Signature  | Name and Title Crystal Layton, Regulatory Manager | Date 11/28/18 |
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| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | Product Bifenthrin Technical Insecticide/Miticide | | | |
| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |

| | | | | |
|---|----------|--|-----|------------------|
| Generic Data Requirements | Cite-All | Syngenta Crop Protctn, Greensboro NC | PAY | |
| United Phosphorus, Inc. (UPI) is using the cite-all option to satisfy generic data requirements for bifenthrin (PC 128825). UPI will make offers to pay to the following companies on the 10/1/2018 Pesticide Data Submitter's List for bifenthrin. | Cite-All | Nufarm Americas, Inc., Morrisville, NC | PAY | |
| | Cite-All | The Scotts Co. dba Ortho, Marysville, OH | PAY | |
| | Cite-All | Bayer Cropscience LP; RTP, NC | PAY | |
| | Cite-All | FMC Corp.; Philadelphia, PA | PAY | |
| | Cite-All | Bayer Env. Science; RTP, NC | PAY | |
| | Cite-All | BASF Corp, RTP, NC | PAY | |
| | Cite-All | The Scotts Co., Marysville, OH | PAY | |
| | Cite-All | Lebanon Seaboard Corp., Lebanon, PA | PAY | |
| | Cite-All | McLaughlin Gormley King Co, dba MGK, Minneapolis, MN | PAY | |
| Signature  | | Name and Title Crystal Layton, Regulatory Manager | | Date 11/28/18 |

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| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | Product Bifenthrin Technical Insecticide/Miticide | | | |
| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |

| | | | | | |
|--|--|----------|--|-----|--|
| | | Cite-All | Fuller Systems, Inc., Woburn, MA | PAY | |
| | | Cite-All | Winfield Solutions, LLC, St. Paul, MN | PAY | |
| | | Cite-All | Sergeant's Pet Care Prd's, Omaha, NE | PAY | |
| | | Cite-All | Aceto Ag. Chemicals Corp., Port Washington, NY | PAY | |
| | | Cite-All | S. C. Johnson & Son, Inc., Racine, WI | PAY | |
| | | Cite-All | Amvac Chm Corp., Newport Beach, CA | PAY | |
| | | Cite-All | Helena Chemical Co., Memphis, TN | PAY | |
| | | Cite-All | Southern States Co-op., Inc, Salem, VA | PAY | |
| | | Cite-All | Nippon Soda Co., Ltd., New York, NY | PAY | |

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| Signature  | Name and Title Crystal Layton, Regulatory Manager | Date 11/28/18 |
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| Applicant's / Registrant's Name & Address United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | | Product Bifenthrin Technical Insecticide/Miticide | | |
| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | Cite-All | The Andersons, Inc., Maumee, OH | PAY | |
| | | Cite-All | Sunniland Corp., Sanford, FL | PAY | |
| | | Cite-All | Chemsico, St. Louis, MO | PAY | |
| | | Cite-All | Lesco, Inc., Cleveland, OH | PAY | |
| | | Cite-All | ADAMA Makhteshim Ltd, c.o. Makhteshim Agan of NA, Raleigh, NC | PAY | |
| | | Cite-All | Loveland Products, Inc., Greeley, CO | PAY | |
| | | Cite-All | Howard Fertilizer & Chm. Co., Salem, VA | PAY | |
| | | Cite-All | Albaugh, LLC, Valdosta, GA | PAY | |
| | | Cite-All | BASF Sparks, LLC, RTP, NC | PAY | |

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| Signature  | Name and Title Crystal Layton, Regulatory Manager | Date 11/28/18 |
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| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |

| | | | | | |
|--|--|----------|--|-----|--|
| | | Cite-All | Control Solutions, Inc., Pasadena, TX | PAY | |
| | | Cite-All | Arizona Chm Grp, c/o Pyxis Regulatory Consulting, Gig Harbor, WA | PAY | |
| | | Cite-All | Valent USA LLC, Walnut Creek, CA | PAY | |
| | | Cite-All | Pyrethroid Working Grp, c/o Landis, Valdosta, GA | PAY | |
| | | Cite-All | Makhteshim Agan of NA, Raleigh, NC | PAY | |
| | | Cite-All | Arysta Lifescience NA, Cary, NC | PAY | |
| | | Cite-All | Spray Drift TF, Washington, DC | OWN | |
| | | Cite-All | Bengal Products, Inc., Baton Rouge, LA | PAY | |

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| Signature  | Name and Title Crystal Layton, Regulatory Manager | Date 11/28/18 |
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| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | Cite-All | Outdoor Res Exp TF, Washington DC | OWN | |
| | | Cite-All | Ag Reentry TF, Washington, DC | OWN | |
| | | Cite-All | Sapstain Industry Group, Titusville, NJ | PAY | |
| | | Cite-All | Non-Dietary Exp TF, Washington, DC | PAY | |
| | | Cite-All | Nisso LLC, New York, NY | PAY | |
| | | Cite-All | Univar Env. Sciences, Brookfield, CT | PAY | |
| | | Cite-All | FIFRA Engangered Species TF, Lakewood, WA | PAY | |
| | | Cite-All | Residential Exposure JV, Washington, DC | PAY | |
| | | Cite-All | Atex, Inc. c/o Landis, Valdosta, GA | PAY | |

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| Signature  | Name and Title Crystal Layton, Regulatory Manager | Date 11/28/18 |
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| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | Cite-All | Ag Handler Exposure TF, Macon, MO | PAY | |
| | | Cite-All | Osmose Utilities Svcs, Inc, P'tree City GA | PAY | |
| | | Cite-All | Ensystex II, c/o Pyxis, Gig Harbor, WA | PAY | |
| | | Cite-All | Sharda Cropchem Ltd., c/o Wagner, Hockessin, DE | PAY | |
| | | Cite-All | Winfield Solutions, LLC, St. Paul, MN | PAY | |
| | | Cite-All | Tacoma Ag., c/o Pyxis, Gig Harbor, WA | PAY | |
| | | Cite-All | Sharda USA LLC, c/o Wagner, Hockessin, DE | PAY | |
| | | Cite-All | Ensystex IV, c/o Pyxis, Gig Harbor, WA | PAY | |
| | | Cite-All | Wet & Forget USA Ltd, c/o Lewis & Harrison, Washington, DC | PAY | |
| Signature  | | | Name and Title Crystal Layton, Regulatory Manager | | Date 11/28/18 |

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| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |

| | | | | | |
|--|--|----------|---|-----|--|
| | | Cite-All | Ragan and Massey, Inc. c/o Pyxis, Gig Harbor, WA | | |
| | | Cite-All | Generic Endangered Species TF, c/o Pyxis, Gig Harbor, WA | OWN | |
| | | Cite-All | Kaizen Technologies, Johnston, CO | PAY | |
| | | Cite-All | Bifenthrin TF, c/o CSPA, Washington, DC | OWN | |
| | | Cite-All | Vive Crop Prot. Inc., c/o OMC AG Consulting, East Lansing, MI | PAY | |
| | | Cite-All | Liberty Crop Protection, Loveland, CO | PAY | |
| | | Cite-All | Prime Source c/o Wagner, Hockessin, DE | PAY | |
| | | Cite-All | Atticus, LLC. , c/o Pyxis, Gig Harbor, WA | PAY | |

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| Signature  | Name and Title Crystal Layton, Regulatory Manager | Date 11/28/18 |
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| Ingredient Bifenthrin (CAS No. 82657-04-3) | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | Cite-All | Genmerica NA, c/o GHB, LeMars, IA | PAY | |
| | | Cite-All | Tevra Brands, LLC, Omaha, NE | PAY | |

Endnotes for Data Matrix for Bifenthrin Technical Insecticide/Miticide

November 28, 2018

- 830.1650 per OSCPP 830.1000 guidelines, these data are not required for the registration of a technical grade active ingredient. See 830.1620 for production process information.
- 830.6319, 830.6321, 830.7100, 830.7520 - Per OSCPP 830.1000 guidelines, these data are not required for the registration of a technical grade active ingredient. Additionally, this product is not a liquid, is not a fibrous material, and is not used around electrical equipment.

| | | |
|--|--|------------------|
| Signature  | Name and Title Crystal Layton, Regulatory Manager | Date 11/28/18 |
|--|--|------------------|



United Phosphorus, Inc.
Crystal Layton
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406
Phone: (229) 583-3006

November 28, 2018

VIA CDX

Mindy Ondish, Acting PM 3
Registration Division, IVB1
Document Processing Desk (AMEND)
US Environmental Protection Agency
Office of Pesticide Programs (7505P)
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

☎ 703-605-0723

**Subject: Label Amendment for BIFENTHRIN TECHNICAL INSECTICIDE/MITICIDE
(EPA Reg. No. 70506-18)**

Dear Ms. Ondish,

This submission is being made to amend the label for BIFENTHRIN TECHNICAL INSECTICIDE/MITICIDE (EPA Reg. No. 70506-18) to expand the for formulation into uses to cover all potential formulation uses of the product. Please see the highlighted label noting the additional uses. We have also added the Spanish signal word with statement (though not required for a non-WPS product). In the Storage and Disposal section, the container handling statements have also been updated to include fiber drum with liner instructions.

The following are provided in support of this label amendment:

- Application for Pesticide Registration, EPA form 8570-1
- Highlighted label noting changes described above
- Clean label
- Data Matrix, EPA form 8570-34 – Agency copy
- Data Matirx, EPA form 8570-34 – Public copy
- Certification with Respect to Citation of Data, EPA form 8570-35

Should you require additional information or have questions concerning this submission, please contact me via email at crystal.layton@uniphos.com or phone at 229-583-3006.

Sincerely,

A handwritten signature in black ink that reads 'Crystal Layton'.

Crystal Layton
Regulatory Manager